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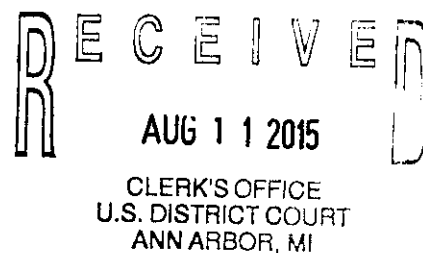
**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Michael Garrison,  
Plaintiff,

V.

Equifax Info. Solutions, TransUnion, L.L.C.,  
Experian, MCI Telecommunications, Sage Telecom,  
AT&T Wireless, and Verizon Wireless.  
Defendants.

Case: 4:15-cv-12880  
Judge: Berg, Terrence G.  
MJ: Grand, David R.  
Filed: 08-11-2015 At 08:31 AM  
CMP GARRISON VS. EQUIFAX INFO. SOLU  
TIONS, ET AL (DP)



**Parties:**

- 1.) The Plaintiff Michael Garrison is a resident of Ypsilanti, Michigan.
- 2.) Defendant Equifax is a corporation and Nationwide Credit Reporting Agency having it's principle business address in Atlanta, Georgia being P.O. Box 740256, Atlanta, GA 30348.
- 3.) Defendant Transunion, L.L.C is a corporation and Nationwide Credit Reporting Agency having it's principle business address in Pennsylvania, being 2 Baldwin Place, P.O. Box 1000, Chester, PA 19022.
- 4.) Defendant Experian is a corporation and Nationwide Credit Reporting Agency having it's principle place of business in Texas being 701 Experian Parkway, Allen, TX 75013.

5.) Defendant Verizon Wireless is a corporation having it's principle place of business in Connecticut being P.O. Box 5029, Wallingford, CT 06492.

6.) Defendant AT & T Wireless is a corporation having it's principle place of business in Illinois, being P.O. Box 6416, Carol Stream, IL 60197.

7.) Defendant Sage Telecom is a corporation having it's principle place of business in Arizona, being P.O. Box 79051, Phoenix, AZ 85062.

### **Jurisdiction**

This Court has Jurisdiction in this matter pursuant to the Fair Credit Reporting Act, being 15 U.S.C §1681 et. Seq..

### **Statement of Facts**

8.) On November 25, 2014, Plaintiff Michael Garrison mailed a Free Annual Credit Request form requesting his credit reports from all of the 3 Nationwide Credit Reporting Agencies, being Defendants Equifax, Transunion, and Experian by U.S. Mail with First Class postage being first fully prepaid to the Annual Credit Report Request Service P.O. Box 105281, Atlanta, GA 30348.

9.) On December 10, 2014 the Plaintiff received a response letter from Transunion Dated December 4, 2014 requesting that he fill out a disclosure request form on the back of the letter and asking for 2 forms of proof of his current address.

10.) On December 10, 2014, Defendant Experian also responded to the Plaintiff's request by disclosing his credit report to him which was dated December 4, 2014. The Experian credit report contained at least 4 pages of false and inaccurate information regarding negative credit accounts.

11.) On December 23, 2014 the Plaintiff fully filled out Defendant Transunions's disclosure request form and mailed it by U.S. Mail to Transunion at P.O. Box 2000, Chester, PA 19022, along with 3 proofs of his current mailing address including a certified Michigan Department of Corrections Verification of Incarceration form, a copy of his MDOC prisoner identification card, and an Offender Tracking Info. System printout listing his current address at that time. The Plaintiff in his letter again requested that his credit report be sent to him as soon as possible and Defendant Transunion again never responded.

12.) On December 24, 2014, the Plaintiff sent by U.S. Mail the dispute form contained within his Experian credit report and disputed a negative Afni/Sage Telecom account which he does not owe and which he already previously disputed, a negative Convergent Outsourcing/DirecTv account which he did not owe, and EOS CCA/AT &T Mobile which he was not liable for, and a negative Pinnacle Credit Services/Verizon Wireless account which does not belong to him.

13.) In January of 2015, the Plaintiff was diagnosed with extremely high Hypertension blood pressure due to the stress caused by the Defendant's actions in this matter and was placed on several medications, and which were later again increased as a result. As a result of having to take said blood pressure medications the Plaintiff experienced severe dizziness, nausea, fatigue and headaches.

14.) On February 3, 2015, the Plaintiff mailed by U.S. Mail another letter to Defendant Transunion stating that it had been 70 days since Plaintiff sent his disclosure form and proofs of his current mailing address and that he had still not received his Transunion credit report in violation of the Fair Credit Reporting Act, and he gave notice that he would file suit if his credit report was not disclosed to him. Defendant Transunion again never responded to Plaintiff's letter.

15.) On February 17, 2015, the Plaintiff again wrote Defendant Experian a letter by U.S. mail to Experian, P.O. Box 2002, Allent, TX 75013 regarding the disputed negative accounts and false information contained in his Experian credit report.

16.) Between February 2015 to around May or June of 2015 the Plaintiff seen psychologist Deserae Acero in Jackson, Michigan regarding his high stress levels caused by the Defendants in this matter.

17.) On January 26, 2015, Defendant Experian responded to the Plaintiff's disputes by deleting the inaccurate Convergent Outsourcing/DirecTv which appeared on Plaintiff's Experian credit report since January of 2014, and by deleting the Afni/Sage Telecom account which was reinserted by Experian after it had already been previously deemed false and deleted. Defendant Experian continues to refuse to delete the false EOC/CCA and Pinnacle credit services accounts.

18.) As a result of the false information contained in the Plaintiff's Experian credit report he was denied a loan/credit by Kabbage Inc. On November 23, 2013, and denied a credit card from Citibank On September 18, 2013.

19.) Also as a result of the false information contained in the Plaintiff's Experian credit report file he was quoted higher auto insurance rates by Progressive Insurance Co., Auto Club Insurance Co. and State Farm Auto Insurance Co. On October 5, 2013, and ended up paying a higher auto insurance rate with E-surance Auto insurance.

20.) On March 24, 2015, the Plaintiff's stress level caused his blood pressure to reach a level of 163 (120 is normal). On March 25, 2015 the Plaintiff again was seen by Psychologist Acero regarding his stress levels caused by the actions of the Defendants in this matter.

21.) On April 9, 2015, the Plaintiff again wrote Defendant Transunion for the 4<sup>th</sup> time requesting a copy of his credit report and informed Transunion of his new address change to Jackson, Michigan and stated again that Transunion was continuing to violate his rights under the Fair Credit Reporting Act-Plaintiff properly addressed and mailed his letter with postage fully prepaid by U.S. Mail to Transunion P.O. Box 2000, Chester, PA 19022.

22.) On April 23, 2015, the Plaintiff received a response letter dated April 21, 2015 from Defendant Equifax requesting 1 proof of identification and 1 proof of the Plaintiff's current address in Jackson, Michigan.

23.) On May 21, 2015, the Plaintiff complied with Defendant Equifax's request by sending a copy of his MDOC Offender Tracking (OTIS) printout of his identification and a May 12, 2015 Court notice from Saginaw County District Court listing his Jackson, MI address. Plaintiff sent this letter by U.S. Mail with First Class postage fully prepaid to Equifax Info. Solutions, P.O. Box 105167,

Atlanta, Ga 30348-5167.

24.) On May 29, 2015 Defendant Equifax finally disclosed the Plaintiff's credit report to him which contained false information in the form of 2 accounts-1 MCI account # 3HR4 Dated 10/06/2010 in the amount of \$176 and 1 Pinnacle Credit Services Account # OG09 Dated 10/01/2013 in the amount of \$1,035.

25.) On July 10, 2015 the Plaintiff disputed online the false information contained in the Equifax credit file.

26.) On or about July 15, 2015, the Plaintiff applied for and was denied credit cards by Discover, Citibank, Capital One and Target based upon the false information maintained in the Plaintiff's credit reports by the Defendants in this matter.

### **CAUSES OF ACTION**

**COUNT I:** The Plaintiff hereby incorporates Paragraphs 8 through 24 and states the following:

**DEFENDANTS TRANSUNION AND EQUIFAX HAVE WILLFULLY AND NEGLIGENTLY VIOLATED THE FAIR CREDIT REPORTING ACT AS SET FORTH IN 15 U.S.C §1681g BY FAILING TO DISCLOSE THE PLAINTIFF'S CREDIT REPORT TO HIM WITHIN 15 DAYS AS REQUIRED.**

**COUNT II:** The Plaintiff hereby incorporates Paragraphs 10 through 26 and states as follows:

**DEFENDANTS TRANSUNION, EQUIFAX AND EXPERIAN HAVE WILLFULLY AND NEGLIGENTLY VIOLATED THE FAIR CREDIT REPORTING ACT BY FAILING TO MAINTAIN REASONABLE PROCEDURES TO ASSURE MAXIMUM POSSIBLE ACCURACY CONCERNING THE PLAINTIFF IN HIS CREDIT FILE.**

**COUNT III:** The Plaintiff hereby incorporates paragraphs 1 through 26 and states the following:

**DEFENDANTS EQUIFAX AND EXPERIAN HAVE WILLFULLY AND NEGLIGENTLY VIOLATED THE FAIR CREDIT REPORTING ACT BY FAILING TO CONDUCT A REASONABLE INVESTIGATION INTO THE PLAINTIFF'S DISPUTES CONCERNING HIS CREDIT REPORTS IN VIOLATION OF 15 U.S.C §1681i(a)(1).**

**COUNT IV:** The Plaintiff hereby incorporates paragraphs 1 through 26 and states the following:

**DEFENDANTS DIRECTV, SAGE TELECOM, AT&T MOBILE, AND VERIZON WIRELESS HAVE WILLFULLY AND NEGLIGENTLY VIOLATED THE FAIR CREDIT REPORTING ACT BY FURNISHING FALSE INFORMATION AND FAILING TO REINVESTIGATE THE PLAINTIFF'S DISPUTES CONCERNING HIS CREDIT REPORT IN VIOLATION OF 15 U.S.C §1681s-2b.**

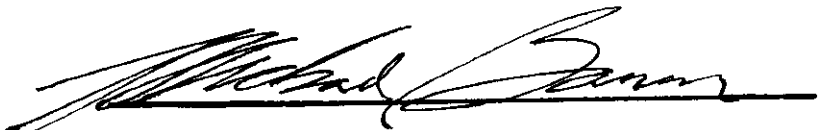
**COUNT V:** The Plaintiff hereby incorporates paragraphs 1 through 26 and states the following:

**ALL OF THE DEFENDANTS HAVE COMMITTED THE TORT OF INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS UNDER MICHIGAN STATE LAW.**

**RELIEF SOUGHT**

WHEREFORE The Plaintiff respectfully requests that this Honorable Court will Grant Declaratory and Injunctive relief against all Defendants and award Compensatory, Punitive and Exemplary damages in the amount of \$600,000 against each Defendant in this matter.

DATED: August 3, 2015

A handwritten signature in black ink, appearing to read "Michael L. Bann", is written over a horizontal line.

Clerk of the Court  
U.S. District Court  
Eastern District of Michigan  
200 E. Liberty St.  
Ann Arbor, MI 48104

**RE: New Action for Filing**  
**Michael Garrison v Equifax Info. Solutions et. al.,**  
**Case No:**  
**HONORABLE:**

August 5, 2015

Dear Clerk;

Please find enclosed for filing in the above-entitled matter: **COMPLAINT UNDER THE FAIR CREDIT REPORTING ACT, 15 U.S.C §1681, AND PLAINTIFF'S APPLICATION TO PROCEED IN FORMA PAUPERIS.** Please assign a Judge and case number as soon as possible. Thank You.

Sincerely,



Michael Garrison

Michael Garrison  
In Pro Per.  
351 Orchard St.  
Ypsilanti, MI 48197



## CIVIL COVER SHEET

County in which action arose \_\_\_\_\_

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

Michael Garrison

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

## DEFENDANTS

EgnFax Info Solutions, et al

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input checked="" type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

## VI. CAUSE OF ACTION

Brief description of cause:

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$ 609,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND:

☐ Yes☒ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG JUDGE



PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

If yes, give the following information:

☐ No

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☐ No

If yes, give the following information:

Court: \_\_\_\_\_

Case No.: \_\_\_\_\_

Judge: \_\_\_\_\_

Notes :

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## New LawsUIT Check List

**Instructions:** Put a check mark in the box next to each appropriate entry to be sure you have all the required documents.

<input checked="" type="checkbox"/> Two (2) completed <b>Civil Cover Sheets</b> .	CLERK TO AFFIX  CASE ASSIGNMENT LABEL  HERE
<input checked="" type="checkbox"/> Enter the number of defendants named in your lawsuit in the blank below, add 2 and then enter the total in the blank. <div style="display: flex; align-items: center; margin-top: 10px;"> <div style="border-bottom: 1px solid black; width: 100px; margin-right: 10px;"></div> <div style="margin-right: 10px;">+ 2 =</div> <div style="border-bottom: 1px solid black; width: 100px; margin-right: 10px;"></div> <div>Complaints.</div> </div> <div style="display: flex; justify-content: space-between; font-size: small; margin-top: 5px;"> <span># of Defendants</span> <span>Total</span> </div> <div style="margin-top: 10px;">           Received by Clerk: <u>DP</u> Addresses are complete: _____         </div>	
<input type="checkbox"/> If any of your defendants are <b>government agencies</b> : Provide two (2) extra copies of the <b>complaint</b> for the U.S. Attorney and the Attorney General.	

<b>If Paying The Filing Fee:</b>	<b>If Asking That The Filing Fee Be Waived:</b>
<input type="checkbox"/> Current new civil action filing fee is attached.  Fees may be paid by check or money order made out to:  <div style="text-align: center; margin: 10px 0;"><i>Clerk, U.S. District Court</i></div> Received by Clerk: _____ Receipt #: _____	<input checked="" type="checkbox"/> Two (2) completed <b>Application to Proceed in District Court without Prepaying Fees or Costs</b> forms.  <div style="text-align: center; margin: 10px 0;"><i>1 IFP provided</i></div> Received by Clerk: _____

**Select the Method of Service you will employ to notify your defendants:**

<b>Service via Summons by Self</b>	<b>Service by U.S. Marshal</b> <small>(Only available if fee is waived)</small>	<b>Service via Waiver of Summons</b> <small>(U.S. Government cannot be a defendant)</small>
<input type="checkbox"/> Two (2) completed <b>summonses</b> for each defendant including each defendant's name and address.   <div style="text-align: center; font-size: 2em; margin: 20px 0;"><i>N/A</i></div> Received by Clerk: <u>DP</u>	<input type="checkbox"/> Two (2) completed <b>USM – 285 Forms</b> per defendant, if you are requesting the U.S. Marshal conduct service of your complaint.  <input type="checkbox"/> Two (2) completed <b>Request for Service by U.S. Marshal</b> form.  <div style="text-align: center; font-size: 2em; margin: 20px 0;"><i>N/A</i></div> Received by Clerk: <u>DP</u>	<input type="checkbox"/> You need not submit any forms regarding the Waiver of Summons to the Clerk.  <u>Once your case has been filed, or the Application to Proceed without Prepaying Fees and Costs has been granted, you will need:</u> <ul style="list-style-type: none"> <li>One (1) <b>Notice of a Lawsuit and Request to Waive Service of a Summons</b> form per defendant.</li> <li>Two (2) <b>Waiver of the Service of Summons</b> forms per defendant.</li> </ul> Send these forms along with your filed complaint and a self-addressed stamped envelope to each of your defendants.  <div style="text-align: center; font-size: 2em; margin: 20px 0;"><i>N/A</i></div>

**Clerk's Office Use Only**

Note any deficiencies here: